

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,
Plaintiff,

v.

EDWARD S. ADAMS,
Defendant.

17-CR-64-DWF-KMM

**DEFENDANT'S MOTION TO
SEAL DOCUMENTS FILED
UNDER TEMPORARY SEAL**

Defendant Edward Adams in the above-captioned action has filed the following
under seal:

- Defendant's Motion to Dismiss the Superseding Indictment, Or in the Alternative for Disqualification, For Privilege Violations
- *In camera* Exhibit A
- *In camera* Exhibit B
- *In camera* Exhibit C
- *In camera* Exhibit D
- *In camera* Exhibit E
- *In camera* Exhibit F
- *In camera* Exhibit G
- *In camera* Exhibit H
- *In camera* Exhibit I
- *In camera* Exhibit J
- *In camera* Exhibit K
- *In camera* Exhibit L
- *In camera* Exhibit M
- *In camera* Exhibit N
- *In camera* Exhibit O
- *In camera* Exhibit P
- *In camera* Exhibit Q
- *In camera* Exhibit R
- *In camera* Exhibit S
- *In camera* Exhibit T
- *In camera* Exhibit U

Defendant brings this motion pursuant to LR 49.1(d)(1)(A) to seal because the above-listed documents contain information that Mr. Adams contends contains attorney-client privileged and attorney work product material that should not be revealed to or accessed by the government. Unless and until this Court determines that some or all of these materials are not protected by the attorney-client privilege or the work product doctrine, neither the government nor the public may have access to these materials in their unredacted form. To allow such access may effectively constitute a waiver of the attorney-client privilege or work product protection and may defeat the purpose of Mr. Adams's motion herein to assert such privilege over these materials.

Dated: June 1, 2018

Respectfully submitted,

/s/ Gloria K. Maier

Joseph G. Petrosinelli (DC Bar #434280)

Lance Wade (DC Bar #484845)

Gloria Maier (DC Bar # 1012208)

WILLIAMS & CONNOLLY LLP

725 Twelfth Street, N.W.

Washington, DC 20005

Telephone: (202) 434-5000

jpetrosinelli@wc.com

lwade@wc.com

gmaier@wc.com

James L. Volling (#113128)
Deborah A. Ellingboe (#26216X)
FAEGRE BAKER DANIELS LLP
2200 Wells Fargo Center
90 South Seventh Street
Minneapolis, MN 55420
Telephone: (612) 766-7000
Facsimile: (612) 766-1600
james.volling@faegrebd.com
debbie.ellingboe@faegrebd.com

Attorneys for Defendant Edward S. Adams